

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

The Bank of New York Mellon, solely in its  
capacity as Trustee for the TV Azteca, S.A.B. de  
C.V. 8.25% Senior Notes Due 2024,

Plaintiff,

- against -

TV Azteca, S.A.B. de C.V., *et al.*,

Defendants.

Index No. 1:22-cv-08164-PGG

**NOTICE AND [PROPOSED] ORDER TO WITHDRAW AS COUNSEL**

PLEASE TAKE NOTICE that upon the accompanying declaration of Shane D. Avidan, and subject to the approval of the Court, Shane D. Avidan hereby withdraws as counsel for defendants TV Azteca, S.A.B. de C.V., et al., and shall be removed from the Case Management/Electronic Case Files (CM/ECF) notification list in the above-captioned matter. Defendants will continue to be represented by Paul, Weiss, Rifkind, Wharton & Garrison LLP in this proceeding.

Dated: New York, New York  
July 14, 2023

**PAUL, WEISS, RIFKIND,  
WHARTON & GARRISON LLP**

By: /s/ Shane D. Avidan

Shane D. Avidan

1285 Avenue of the Americas

New York, NY 10019-6064

Tel: (212) 373-3476

Fax: (212) 492-0476

savidan@paulweiss.com

*Attorney for Defendants*

SO ORDERED:

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U.S.D.J.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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capacity as Trustee for the TV Azteca, S.A.B. de  
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Plaintiff,

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TV Azteca, S.A.B. de C.V., *et al.*,

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**DECLARATION OF SHANE D. AVIDAN**

1. I am an associate at the law firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, counsel for defendants TV Azteca, S.A.B. de C.V., et al.. I submit this declaration in compliance with Local Rule 1.4 to notify the Court that I am seeking to withdraw as counsel because, as of July 14, 2023, I will no longer be associated with Paul, Weiss, Rifkind, Wharton & Garrison LLP.

2. Paul, Weiss, Rifkind, Wharton & Garrison LLP will continue to represent defendants in this proceeding.

3. In my opinion, my withdrawal will not delay the matter or prejudice any party.

4. I am not retaining a charging lien.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 14, 2023

/s/ Shane D. Avidan

Shane D. Avidan

**CERTIFICATE OF SERVICE**

I hereby certify that, on July 14, 2023, I caused a true and correct copy of the foregoing to be served upon all parties to this litigation via the CM/ECF system and upon defendants via e-mail.

Dated: July 14, 2023

/s/ Shane D. Avidan  
Shane D. Avidan